## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
HOUSTON REAL ESTATE PROPERTIES LLC, Debtor.	& & &	CASE NO 22-32998 (CHAPTER 7)
Debior.	- §	
JOHN QUINLAN, OMAR KHAWAJA	<b>§</b>	
AND OSAMA ABDULLATIF Plaintiffs,	§ 8	ADVERSARY NO. 23-03141
	\$ §	71D VERSTICT 100, 25 05111
V.	§	
	8	
HOUSTON REAL ESTATE PROPERTIES	8	
LLC, et al	Š	

## SHAHNAZ CHOUDHRI'S MOTION TO RECONSIDER THE COURT'S NOVEMBER 18, 2024 ORDER GRANTING MOTION FOR SANCTIONS AGAINST DEFENDANT SHAHNAZ CHOUDHRI, VACATE DEFAULT JUDGMENT, AND REINSTATE PLEADINGS

TO THE HONORABLE JEFFREY P. NORMAN, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Shahnaz Choudhri ("Shahnaz" or "Movant") and files this, her Motion to Reconsider the Court's November 18, 2024 Order Granting Motion for Sanctions Against Defendant Shahnaz Choudhri, Vacate Default Judgment, and Reinstate Pleadings ("the Court's Order"). In support thereof, Movant respectfully shows the Court as follows:

## I. SUMMARY OF REQUESTED RELIEF

On November 18, 2024, the Court entered its Order striking Movant's pleadings "as if never filed" and issued a Default Judgment against the Movant for failure to appear for a scheduled deposition. See Exhibit A, p. 2. Pursuant to the Court's Order, Movant was granted leave to seek relief from this Court, by

<sup>&</sup>lt;sup>1</sup> Movant notes for the record that she was forced to reschedule her deposition as a result of a serious health emergency. The aforementioned health emergency was the subject of her related Emergency Motion to Reschedule Deposition filed before this Court prior to the scheduled deposition; which was subsequently denied by this Court.

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way of motion practice and scheduling and appearing at a deposition no later than November 25, 2024, to

vacate the default judgment entered against her and reinstate her pleadings. Id.

Pursuant to the Court's Order, Movant appeared for and completed her deposition on November

25, 2024 in full compliance with the Court's Order. Movant now seeks to vacate the November 18, 2024

Order Granting Motion for Sanctions Against Defendant Shahnaz Choudhri, vacate the Default Judgment

entered against her, and reinstate her stricken pleadings.

II. **PRAYER** 

Movant Shahnaz Choudhri respectfully requests that this Court grant her Motion to Reconsider

the Court's November 18, 2024 Order Granting Motion for Sanctions Against Defendant Shahnaz

Choudhri, Vacate Default Judgment, and Reinstate Pleadings as Movant has complied with all requirements

of the Court's Order in order to warrant a granting of the relief requested herein.

Dated: December 2, 2024

Respectfully submitted,

Shackelford, McKinley & Norton, LLP

By: /s/Lori A. Hood

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**ATTORNEY FOR** 

**SHAHNAZ CHOUDHRI** 

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on interested parties by electronic delivery on 12/2/2024.

Thomas Michael Ballases on behalf of Plaintiff John Quinlan ballases@hooverslovacek.com

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Jennifer Lea MacGeorge on behalf of Defendant 2727 Kirby 26L LLC service@jlm-law.com

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Notice will be electronically mailed, via direct email correspondence to:

Ali Choudhri ali@jetallcompanies.com, legal@jetallcompanies.com

/s/ Lori A. Hood Lori A. Hood